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BEFORE THE  
DEPARTMENT OF TRANSPORTATION  
OFFICE OF THE SECRETARY  
WASHINGTON, D.C.

RECEIVED  
MARCH 17 1998

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Application of: )  
)  
COMPANIA MEXICANA DE AVIACION )  
S.A. DE C.V. )  
)  
For an Exemption to Provide Scheduled )  
Service Between Zacatecas, Mexico and )  
Oakland, CA )  
\_\_\_\_\_)

Docket OST-98-3571

**ANSWER OF THE PORT OF OAKLAND IN SUPPORT OF  
THE APPLICATION OF MEXICANA DE AVIACION  
S.A. DE C.V. FOR EXEMPTION AUTHORITY**

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**ANSWER OF THE PORT OF OAKLAND IN SUPPORT OF  
THE APPLICATION OF MEXICANA DE AVIACION  
S.A. DE C.V. FOR EXEMPTION AUTHORITY**

The Port of Oakland (d/b/a Oakland International Airport, "Oakland") hereby files this Answer in strong support of an application dated March 2, 1998 by Mexicana de Aviacion S.A. de C.V. ("Mexicana") seeking authority to perform scheduled foreign air transportation of persons, property and mail between Zacatecas, Mexico and Oakland, California.

In support of its position, Oakland states as follows:

1. As one of the oldest foreign carriers serving the U.S., Mexicana is clearly more than qualified to operate its scheduled service in the rapidly-developing and important Oakland - Zacatecas market as evidenced by the award of this authority to Mexicana by the Mexican DGAC and the designation under the bilateral.

2. Oakland places a high priority on international air service expansion in order to stimulate tourist and business growth, international commerce and development of the Bay Area's economy in general. Oakland encourages development and other infrastructure enhancements, support for programs which make OAK a more welcome place for visitors, and the expansion of overseas promotional activities. OAK also plans to expand its existing facility by adding additional terminal and parking space by the year 2002.

3. The San Francisco - Oakland - San Jose Consolidated Area is the fourth-ranking market in the U.S. and Oakland currently receives service from a number of U.S. and foreign carriers, including Southwest, UPS, Federal Express, TAESA, Martinair, and CityBird. Oakland's close proximity to downtown San Francisco makes it a destination for both leisure and business travelers to the Bay Area as well as VFR traffic. Because of its convenient location and facilities, Oakland is the fastest growing U.S. gateway to Latin America, with a 24.1% growth rate between 1996 and 1997. See April Pearson, "Southern Boom," Airline Business, March 1998 at 71.

4. The addition of a second Mexican flag carrier in the Oakland - Mexico market is clearly in the public interest, as not only will it offer Oakland - Mexico passengers a new service option, it would also add a new service option to Mexico from the Bay Area as a whole. The additional service proposed by Mexicana in its application would continue to enhance business and tourist growth at OAK and the Bay Area in general.

WHEREFORE, for the foregoing reasons, the Port of Oakland strongly supports the application of Compania Mexicana de Aviacion, S.A. de C.V. for authority to perform scheduled foreign air transportation of persons, property and mail between Zacatecas, Mexico and Oakland, California.

Respectfully submitted,

*Steve Grossman/ek*

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